

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on Sunday  
and Holiday Collections

Docket No. C2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
IN OPPOSITION TO THE POPKIN MOTION TO COMPEL REGARDING  
DBP/USPS-18 - 19  
(August 10, 2001)

On August 3, 2001, David Popkin filed a motion to compel responses to the above items. The Postal Service hereby opposes that motion.

In his motion to compel, Mr. Popkin makes no attempt to address the matters raised by the Postal Service's July 27 objections. He merely reiterates why he wants the requested information. He does not explain why his questions are timely, why they constitute proper follow-up, why each response would be relevant and material, why it would not be unduly burdensome to attempt to respond, or why item 19 is not barred by the ruling in P.O. Ruling No. C2001-1/4 (July 6, 2001). The Postal Service sees no need to repeat its own arguments here, rather than simply incorporating the contents of the July 27 objections herein by reference. Under the circumstances of Mr. Popkin's abject failure even to acknowledge the objections raised, however, his motion to compel should be summarily denied.

Therefore, for the reasons stated above, and those stated in the Postal Service's July 27 objections, Mr. Popkin's motion to compel responses to items 18 and 19 should be denied.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux  
Chief Counsel  
Ratemaking

  
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Eric P. Koetting  
Attorney

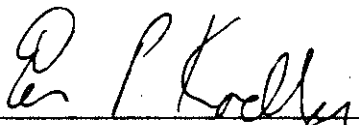
475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2992/ FAX: -5402  
August 10, 2001

**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

Douglas F. Carlson  
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David B. Popkin  
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\_\_\_\_\_  
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